

<b>POLICIES AND PROCEDURES</b>
<b>TOPIC:</b> Master Patient Index
<b>DOCUMENT NUMBER:</b> 200
<b>EFFECTIVE DATE:</b> July 18, 2013



**I. BACKGROUND AND PURPOSE**

The purpose of this policy is to describe the establishment and operation of a Master Patient Index by the WVHIN. The purpose of the Master Patient Index is to serve as the permanent record of each Patient’s Consent decision to either participate in the Health Information Exchange sponsored by the WVHIN, or to Opt-Out.

**II. POLICY**

Under the WVHIN’s Policy and Procedure Document Number 100, Patients are offered a meaningful way to express their Consent to either enroll or not enroll in the WVHIN’s Health Information Exchange. A Patient who does not want his or her Protected Health Information to be disclosed to other Participating Organizations may Opt-Out of the Health Information Exchange. A Patient shall be deemed to have given his or her Consent to participate in the WVHIN’s Health Information Exchange until and unless the Patient affirmatively Opts-Out.

In order for the WVHIN to comply with each Patient’s Consent decision, it must establish a database to permanently record this decision. This database will require the inclusion of Personal Demographic Information from each Patient of a Data Supplier or Participating Organization, even if the decision was made to Opt-Out. This is necessary to minimize the possibility of improperly matching a Patient who has Opted-Out with another Patient who is participating. It is also necessary to include Personal Demographic Information in the Master Patient Index because, despite a Patient’s decision to Opt-Out, the Health Information Exchange may nevertheless exchange Protected Health Information on behalf of that Patient for Public Health Reporting.

Because Patient Demographic Information will be included in the Master Patient Index even for Patients who elected to Opt-Out of the Health Information Exchange, it is important that Patients receive notice of this fact. The WVHIN must publish a Patient Notice in at least one qualified newspaper of general circulation in each area that the WVHIN intends to serve designed to inform Patients about the use, function, benefits, and risks of the WVHIN’s Health Information Exchange (see Policy and Procedure Number 100). This publication must occur at least thirty (30) days prior to the date upon which the WVHIN’s Health Information Exchange becomes functional in the defined area. Likewise, a Participating Organization must provide every Patient with a similar Patient Notice about the WVHIN during the first visit or encounter

with a Patient after it enrolls in the Health Information Exchange (see Policy and Procedure Number 100). These procedures will promote the principles of notice, openness, and transparency needed to build Patient confidence in the WVHIN.

The Master Patient Index will include only Personal Demographic Information – Patient names and other non-clinical details used to identify the Patient (date of birth, address, a portion of the Social Security number, etc.). The Master Patient Index will not include any clinical or health-related information. The Master Patient Index will be promptly updated in accordance with any change in the Patient’s Consent to participate or not participate in the Health Information Exchange. The WVHIN will utilize a Record Locator Service which it maintains and operates to match Patients according to the Personal Demographic Information contained in the Master Patient Index.

### **III. PROCEDURES**

#### **A. Patient Procedures.**

1. After a Participating Organization provides the Patient with a written Patient Notice developed and approved by the WVHIN, the Patient will make a Consent decision to either maintain enrollment in the Health Information Exchange, or to Opt-Out.

2. The Patient Notice will explain, among other things, that regardless of his or her Consent decision to participate or Opt-Out, the Patient’s Personal Demographic Information will be included in the Health Information Exchange’s Master Patient Index to serve as the permanent record of that Consent decision, as well as to allow the exchange of the Patient’s Protected Health Information for Public Health Reporting.

3. Alternatively, the Patient Notice will be included in the website maintained by the WVHIN for review by the Patient. If the WVHIN offers a Patient the ability to Opt-Out on-line, he or she must acknowledge receipt of this Patient Notice prior to any on-line decision is made to maintain participation or Opt-Out.

#### **B. Participating Organization Procedures.**

1. The Full Service Participating Organizations shall supply or otherwise make available personal Demographic Information and Protected Health Information on every Patient in the WVHIN. Regardless of whether a Patient elects to participate or to Opt-Out, the Participating Organization will transmit Personal Demographic Information to the WVHIN along with any Patient’s Consent decision to Opt-Out for permanent recordation in the Master Patient Index. The ability of a Patient to Opt-Out of the Health Information Exchange must be made available by both Full Service and Data User Participating Organizations.

2. Upon enrollment in the Health Information Exchange, a Full Service Participating Organization will electronically supply or otherwise make available to the WVHIN Personal Demographic Information and Protected Health Information about all of its Patients so that other

Participating Organizations may access their Protected Health Information for a Permissible Purpose in accordance with the WVHIN's policies and procedures.

3. Although not technically a Participating Organization, a Data Supplier approved by the WVHIN will electronically supply or otherwise make available to the WVHIN Personal Demographic Information and Protected Health Information about all of its Patients so that other Participating Organizations may access their Protected Health Information for a Permissible Purpose in accordance with the WVHIN's policies and procedures.

4. This Personal Demographic Information must include as many of the following data fields as is available:

- (i) full name, including first, middle, and last name, and any designations such as Jr., Sr., II, III, etc.;
- (ii) full Social Security number;
- (iii) full address, including street number, suite or apartment number, post office box, city, and state;
- (iv) zip code;
- (v) date of birth;
- (vi) gender;
- (vii) telephone number(s);
- (viii) driver's license or state identification number; and
- (ix) Health Plan beneficiary or account numbers.

5. The WVHIN may expand or contract this list of Personal Demographic Information as it deems necessary and appropriate from time to time.

6. Full Service Participating Organizations and Data Suppliers will immediately transmit to the WVHIN known changes to its Patients' Personal Demographic Information so as to ensure that the records maintained by the WVHIN in its Master Patient Index are current.

7. A Participating Organization must immediately notify the WVHIN of any change in the Patient's Consent to participate or not participate in the Health Information Exchange. For purposes of this Policy and Procedure, the term "immediately" means within the same business day.

8. A Participating Organization will not deny care to any Patient solely because he or she elects to Opt-Out of the Health Information Exchange.

C. WVHIN Procedures.

1. Upon enrollment in the Health Information Exchange, a Full Service Participating Organization and Data Supplier will electronically supply or otherwise make available to the WVHIN Personal Demographic Information and Protected Health Information about all of its Patients. The WVHIN's Health Information Exchange will maintain a Master Patient Index to permanently record each Patient's Consent decision to Opt-Out. This Master Patient Index will contain this Personal Demographic Information on each Patient identified by its Participating Organizations.

2. The Health Information Exchange will utilize a Record Locator Service maintained and operated by the WVHIN in compliance with Policy and Procedure Document Number 201 to match Patients according to the Personal Demographic Information contained in the Master Patient Index. Through a combination of the Master Patient Index and the Record Locator Service, a Participating Organization may access the Protected Health Information of a Patient for a Permissible Purpose in accordance with the WVHIN's policies and procedures.

3. The WVHIN will ensure that the Personal Demographic Information it electronically maintains will be immediately updated based upon data submitted by its Participating Organizations, Data Suppliers, or by Patients on-line.

4. The WVHIN will also ensure that any change to a Patient's Consent to participate or not participate in the Health Information Exchange is immediately updated based upon data submitted by its Participating Organizations or by Patients on-line.

5. The WVHIN will maintain the privacy and security of Personal Demographic Information electronically maintained in the Master Patient Index to the same extent that it otherwise maintains the privacy and security of Protected Health Information, and will ensure that such Personal Demographic Information will not be shared with third parties outside the WVHIN's Health Information Exchange who are not Participating Organizations or Business Associates.

6. To the extent feasible given the functionality of the Master Patient Index and the Record Locator Service incorporated within it Health Information Exchange, the WVHIN will seek to utilize national best practices for maintaining the integrity of all Personal Demographic Information contained therein, including the merging of duplicate entries and the timely updating of new information.